

# **EXHIBIT 14**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW JERSEY

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IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

Case No. 16-2738

THIS DOCUMENT RELATES TO (FLW) (LHG)  
ALL CASES  
MDL Docket No. 2738

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Friday, January 11, 2019

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The video deposition of SHAWN LEVY, Ph.D.,  
taken pursuant to notice, was held at the  
Embassy Suites Huntsville, 850 Monroe Street  
S.W., Huntsville, Alabama, commencing at  
approximately 9:04 a.m., on the above date,  
before Lois Anne Robinson, Registered Diplomate  
Reporter, Certified Realtime Reporter, and  
Notary Public for the State of Alabama.

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1 Q Have any of those projects attempted to  
2 research the potential causes of ovarian cancer?

3 A Again, I'd have -- I'd have to review  
4 the projects. They're certainly --  
5 fundamentally, most of the questions regarding  
6 the analysis of cancer samples are routinely to  
7 investigate their cause or their treatment. So I  
8 would -- I would answer that question as highly  
9 likely.

10 Q Would you agree the cause of ovarian  
11 cancer remains unknown today?

12 MS. O'DELL:

13 Object to the form.

14 A No, I would -- I would -- I would not  
15 agree that it -- I would not agree to that  
16 general statement.

17 MS. BROWN:

18 Q What are the causes of ovarian cancer  
19 in your mind, Doctor?

20 A Well, the -- the causes of -- of  
21 a -- of any number of cancers, including ovarian  
22 cancer, are probably more well understood now  
23 than ever, and their complexities I think now are  
24 just beginning to be appreciated in the sense

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1 that cancer is a disease of unregulated cell  
2 growth.

3 Back to our earlier con- -- earlier  
4 conversation, some of the fundamental facts that  
5 we had discussed and, in fact, I think well  
6 replicated in a number of sources, as you pointed  
7 out to me, you know, illustrate that there's a  
8 milieu of genetic change leading to cellular  
9 transformation, and that cellular damage, if we  
10 consolidate that as cellular damage, then has to  
11 work in concert with a number of other events  
12 providing the right environment for a tumor to  
13 grow, such as inflammation, chronic or acute.  
14 And, so, the -- you know, the -- the -- you know,  
15 giving a singular cause would be inappropriate.

16 But I would say the mechanistic causes  
17 of cancer are reasonably well understood, but how  
18 those apply to the wide diversity of cancer types  
19 remains an area of active investigation.

20 I think what's interesting on cancer in  
21 general is that there's no -- really no longer a  
22 bucket diagnosis. It is -- it -- lung cancer is  
23 more complex than lung cancer and ovarian cancer,  
24 certainly with the --

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1                   As I'm sure you're well aware, with the  
2 molecular subtypes and other things, it's a  
3 complicated disease as well.

4                   So to summarize that is -- to summarize  
5 all of that complexity by saying that the cause  
6 is known or unknown I think would vastly  
7 underestimate the -- our current state of the art  
8 or knowledge of how complex cancer is as a  
9 condition.

10 Q               Sure.

11                   Scientists, researchers, public health  
12 authorities continue to investigate the mechanism  
13 by which ovarian cancer is caused. Correct?

14 A               That's correct.

15 Q               We do not, sitting here today in 2019,  
16 have a complete understanding of the etiology of  
17 ovarian cancer. Correct?

18 MS. O'DELL:

19                   Object to the form.

20 A               I would say we have substantial  
21 knowledge of factors and exposures that either  
22 predispose or directly cause cancer in a large  
23 number of -- large number of cancer areas,  
24 including ovarian cancer.

1                   Now, the -- whether that represents the  
2 complete milieu of possibilities is -- is what is  
3 currently under research.

4 MS. BROWN:

5 Q                Were you aware that the University of  
6 Alabama Comprehensive Cancer Center is an NCI  
7 center, National Cancer Institute?

8 A                Yes. It's -- it's not only an  
9 NCI-designated center; it's an NCI-designated  
10 comprehensive cancer center, which is a slightly  
11 different classification. It's a -- there's more  
12 criteria for a cancer center to meet to become  
13 comprehensive.

14 Q               What does it mean to be an NCI center,  
15 to you, if you know?

16 A               Stated very simply, it means you have  
17 a -- your cancer center is funded by a support  
18 grant directly from the National Cancer Institute  
19 to provide -- that supports not only patient care  
20 but also supports basic research, epidemiology  
21 and -- and health outcomes research in cancer.

22                   So, in a nutshell, it is a fairly  
23 comprehensive grant that supports a wide variety  
24 of work within a cancer center that extends